

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

File No.: 25-16-017

**COTTRELL SOLENSKY, P.A.**

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**Attorneys for Defendant,**

**Wal-Mart Stores East, LP i/p/a Wal-Mart Stores, Inc.**

**ROSA CUZCO,**

**Plaintiff,**

**vs.**

**WAL-MART STORES, INC., JOHN  
DOES 1-10 (said names being  
fictitious) and XYZ**

**CORPORATIONS 1-10 (said  
names being fictitious),**

**Defendant(s).**

Civil Action No.:

**NOTICE OF REMOVAL**

Removing Defendant, Wal-Mart Stores East, LP i/p/a Wal-Mart Stores, Inc., upon information and belief states as follows:

1. Plaintiff, Rosa Cuzco, commenced an action against the removing Defendants, Wal-Mart Stores, Inc., in the Superior Court of New Jersey, County of Union, bearing docket number UNN-L-3087-17. A copy of the Complaint is annexed hereto as **Exhibit A**.

2. The Complaint was served on or about August 28, 2017.

3. Plaintiff is a resident of the State of New Jersey.

4. Wal-Mart Stores, Inc. is a corporation organized and existing under the laws of the State of Delaware with a principal place of business in Bentonville, Arkansas.

5. Wal-Mart Stores East, LP, the proper party in interest, is a limited partnership organized and existing under the laws of the State of Delaware with a principal place of business in Bentonville, Arkansas.

6. The amount in controversy is more than \$75,000.00

7. Accordingly, this Court has diversity jurisdiction of this action pursuant to 28 U.S.C. §1332, and Defendant is entitled to removal of this action pursuant to 28 U.S.C. §1441.

**WHEREFORE**, Defendant prays that this action be removed to the United States District Court for the District of New Jersey, pursuant to 28 U.S.C. §1441 and 1446.

**COTTRELL SOLENSKY, P.A.**  
Attorneys for Defendant,  
Wal-Mart Stores East, LP i/p/a  
Wal-Mart Stores, Inc.

By: /s/Andrew J. Piñon  
Andrew J. Piñon, Esq.

Dated: September 15, 2017